

EXHIBIT 2

Record of Decision
(Excerpts)

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U.S. Department of the Interior
Bureau of Land Management

Bald Mountain Mine Plan of Operations Amendment Juniper Project Record of Decision

Case File # NVN-082888

DOI-BLM-NV-L060-2021-0013-EIS



U.S. Department of the Interior
Bureau of Land Management
Bristlecone Field Office
702 North Industrial Way
Ely, Nevada 89301

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Critical Element / Resource / ACEPM No.	Applicant-committed Environmental Protection Measures North Operations Area
136	Process components will be designed, constructed, and operated in accordance with NDEP regulations and BLM 40 CFR 3809 regulations. The Waste Rock Management Plan contains provisions to effectively minimize the potential for acid or metals release from RDAs that could adversely impact surface water and groundwater quality. To minimize impacts to water resources, the proposed HLFs will be designed and operated as zero-discharge facilities, with a composite liner system in accordance with NDEP criteria. Waste rock material will be managed in accordance with the Waste Rock Management Plan. KG-BM will conduct geochemical evaluations of the waste rock in accordance with applicable water pollution control permits. The geochemical characterization program will provide representative information to evaluate the potential to degrade waters of the state. Refer to ACEPM No 14, 15, 16, and 137. (2020)
137	The network of groundwater wells will be expanded to further characterize the groundwater quality and to monitor groundwater elevations within the NOA. KG-BM will use the monitoring data to update the Waste Rock Management Plan, as necessary. Refer to ACEPM No. 14, 15, 16, and 136. (2020)
138	<p>BLM Ely District RMP Water Resource BMPs:</p> <ul style="list-style-type: none"> • Access roads and fords that cross stream channels will be constructed to BLM road standards. • New road or existing road improvements will not occur within 300 feet of a stream channel unless authorized by the BLM Field Manager or Authorized Officer. • Stream crossings on travel routes and trails will be limited to the minimal number necessary to minimize sedimentation and compaction. The BLM Authorized Officer will determine if any impacts need to be rehabilitated by the permittee. (2016) <p>The project Reclamation Plan will be implemented which addresses earthwork and recontouring, revegetation and stabilization, draindown and long-term draindown management, and includes monitoring operations necessary to satisfactorily reclaim the proposed disturbance including pits, underground mines, RDAs, roads, ponds, heaps, stockpiles, drill holes, wells, infrastructure, and equipment. The Reclamation Plan includes monitoring, maintenance and reporting to NDEP. This plan will be consistent with the stipulated post-mining land uses. (2023)</p>
139	Groundwater quality is monitored in the NOA's Mooney Basin area in the Ruby Valley hydrographic basin pursuant to Water Pollution Control Permit NEV0098100. As part of the NDEP reporting requirements, and in coordination with the NDEP if there are trends resulting in consistent constituent exceedances which requires the development of an NDEP required corrective action plan including a change to the frequency of sampling, then KG-BM will share this information with the USFWS and create an opportunity for engagement. (2022)
Wild (Free Roaming) Horses	
140	The Project will adhere to BLM BMPs for range fencing specifications and to the wildlife requirements for manmade water bodies as defined in the Industrial Artificial Pond Permits issued by the NDOW. Per BLMs BMPs, If range fencing is required in the same areas as wildlife fencing, the wildlife fencing will prevail and there will be no circumstance where range and wildlife fencing would be installed for the same mining component feature. (2016) Range fencings require four-strand (three-strand barbed wire and a smooth bottom strand) around new HLFs, process facilities and freshwater ponds as presented in mitigation measure LG-1 (2016).
141	Reclamation activities will be conducted as soon as practicable. See Soil Resources. (2016) This ACEPM No. 141 is a repeat of ACEPM No. 74. Refer to ACEPM Nos. 13, 65, 74, 75, 77, 78, 80, 89, 90, 118, 119, 134,142, and 150.

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142	A <i>planned concurrent reclamation program</i> is included as part of the Juniper Project that identifies specific mine components that will be concurrently reclaimed. The mine components selected for the <i>planned concurrent reclamation program</i> are based on several factors, and may be adjusted due to change in scope, budgeting, access to materials. Refer to ACEPM No. 65, 74, 75, 77, 78, 80, 89, 90, 118, 119, 134, 141 and 150. (2020)
143	BLM Ely District RMP Wild Horses Resource BMPs: <ul style="list-style-type: none"> To protect wild horses and wildlife all new fences will be marked every 16 feet with durable material such as sage grouse diverters that are at least 1-inch-wide and hang from the top wire of the fence. Road signs for safety and protection of wild horses will be required if a project involves heavy or sustained traffic. (2016)
Wildlife Resources	
144	<p>The BBCS is a project specific document that is designed to reduce or eliminate potential adverse effect to bird and bats during construction, operations, and reclamation of mine components. The BBCS includes a risk assessment that evaluates the potential effects of activities at mining components and includes specific measures applicable to the risk outcome at the mine component. In general, the BBCS includes:</p> <ul style="list-style-type: none"> Reducing the potential for bird and bat injury or mortality by implementing specific actions which are referred to as conservation measures; Identifying and isolate where bird and bat mortality has occurred or has the potential to occur to minimize future incidents; Establishing a bird and bat reporting system to document incidents of mortality caused by electrocution, collision, and other project-related features; Identifying and employing conservation measures¹ to address potential impacts as a result of activities at mine components; Complying with State of Nevada permits applicable to bird and bat conservation including covering, containment, chemical neutralization or isolation and monitoring; Reporting and response requirements for wildlife mortalities and injuries; Quality control; and Supporting compliance with the state and federal regulations. <p>The BBCS is a voluntary, living document that is evaluated and modified to improve its effectiveness, as appropriate. Updates and/or modifications to the BBCS are conducted in consultation with a qualified biologist selected at KG-BM's discretion. (2020)</p> <p>Notes: The BBCS is intended to reduce potential adverse effects to bird and bat species including golden eagles; however, distinct conservation measures for golden eagles are located in the Bald Mountain Mine Eagle Conservation Plan.</p> <p>The ECP ACEPM is a companion to this BBCS ACEPM whereas there are listed conservations measures for golden eagles.</p> <p>¹ CMs listed in the BBCS are replicated in this ACEPM table. These measures and actions are designed to avoid, minimize, or mitigate potential adverse effects to bird and bat species ranging from conducting surveys for migratory birds nests to pursuing concurrent reclamation activities.</p>